IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

Tyronne Young *Plaintiff*,	§ § §	
v.	§	Civil Action No. 3:14-cv-00403
	§	
Energy XXI GOM, LLC and Energy XXI Holdings, Inc. *Defendants*.	§ § §	

Plaintiff's Second Amended Complaint

Plaintiff Tyronne Young brings this action complaining of Defendants Energy XXI GOM, LLC, Energy XXI Holdings, Inc., Energy XXI Services, LLC, EPL Oil & Gas, Inc., Island Operating Company, Inc., All Coast, LLC, and Advanced Fire & Safety, L.L.C., and Industrial & Oilfield Services, Inc. (collectively as "Defendants"), and would respectfully show the Court that:

I.

Jurisdiction & Venue

1. This Court has jurisdiction over this matter pursuant to the Outer Continental Shelf Lands Act (OCSLA) 43 U.S.C. § 1331 *et seq*. Venue is proper pursuant to 43 U.S.C. § 1349(b)(1) as one or more Defendant resides and/or may be found in this district.

II.

Parties

2. Plaintiff is a citizen and resident of Louisiana.

3. Defendant Energy XXI GOM, LLC is a Delaware entity with its principal place of business in this District. Defendant Energy XXI GOM, LLC has appeared and answered in this case.

4. Defendant Energy XXI Holdings, Inc. is a Delaware corporation with its principal place of business in this District. Defendant Energy XXI Holdings, Inc. has appeared and answered in this case.

5. Defendant Energy XXI Services, LLC is a Delaware limited liability company with its principal place of business in this District. Defendant Energy XXI Services, LLC has appeared and answered in this case.

6. Defendant EPL Oil & Gas, Inc. is a Delaware corporation that does a substantial amount of business in this District. Defendant EPL Oil & Gas, Inc. has appeared and answered in this case.

7. Defendant Island Operating Company, Inc. is a foreign corporation that does a substantial amount of business in this District. Defendant Island Operating Company, Inc. has appeared and answered in this case.

8. Defendant All Coast, LLC is a foreign limited liability company that does a substantial amount of business in this District. Defendant All Coast, LLC may be served with process through its registered agent, Matthew Moeller, at 201 St. Charles Avenue, Suite 2500, New Orleans, Louisiana 70170.

9. Defendant Advanced Fire & Safety, L.L.C. is a foreign limited liability company that does a substantial amount of business in this District. Defendant Advanced Fire & Safety, L.L.C. may be served with process through its registered agent, Michael Leblanc, at 211 Jared Drive, Broussard, Louisiana 70518.

10. Industrial & Oilfield Services, Inc. is a Louisiana Corporation that does a substantial amount of business in this District. Defendant Industrial & Oilfield Services, Inc. may be served with process through its registered agent, Earl Anthony Landry, Jr., at 110 East Edwards, Erath, Louisiana 70533.

III.

Facts

11. This lawsuit is necessary as a result of personal injuries that Plaintiff received on or about December 13, 2014. On this date, Plaintiff was injured when he fell on steps on a platform owned, operated, and controlled by Defendants. Plaintiff sustained serious injuries to his back, knee, and other parts of his body in the incident.

12. Defendants are negligent and negligent per se for the following reasons:

a. Failure to properly supervise their crew;

b. Failure to properly train their employees;

c. Failure to provide adequate safety equipment;

d. Failure to provide adequate medical treatment;

e. Operating the vessel with an inadequate crew;

f. Failure to maintain the platform;

g. Vicariously liable for their employees' negligence;

h. Violating applicable Coast Guard, OSHA, and/or BSEE rules; and

i. Other acts deemed negligent.

13. As a result of said occurrences, Plaintiff sustained severe injuries to his body, which resulted in physical pain, mental anguish, and other medical problems. Plaintiff has sustained severe pain, physical impairment, discomfort, disfigurement, mental anguish, and

distress. In all reasonable probability, Plaintiff's physical pain, physical impairment and mental anguish will continue indefinitely. Plaintiff has also suffered a loss of earnings in the past, as well as a loss of future earning capacity. Plaintiff has incurred and will incur pharmaceutical and medical expenses in connection with his injuries.

IV.

Jury Demand

14. Plaintiff has requested a jury trial.

V.

Prayer

15. Plaintiff prays that this citation issue and be served upon Defendants in a form and manner prescribed by law, requiring that the Defendants appear and answer, and that upon final hearing, Plaintiff has judgment against Defendants, both jointly and severally, in a total sum in excess of the minimum jurisdictional limits of this Court, plus pre-judgment and post-judgment interests, all costs of Court, attorneys' fees, punitive damages, and all such other and further relief, to which he may show himself justly entitled.

ARNOLD & ITKIN LLP

/s/ Jason Itkin

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CERTIFICATE OF SERVICE

I certify that on December 23, 2015, a copy of the foregoing was served upon all counsel of record via the Court's electronic filing system ("ECF").

/s/ Jason Itkin
Jason Itkin